

## Enclosure

### Steri-Tech Inc. GCFID raw data vs Chromatograph sheets

#### Example 1

GCFID raw data for file “Steri-Tech NAO2021\_1178,” generated on August 12, 2021, at 18:35:48, reported a result of 1,531.486. However, the chromatograph sheet for that same file includes an area count of 10,531.486 and equates to a concentration of ~1,760 ppm.<sup>1</sup> A result of 1,531.486 equals ~257 ppm. This inconsistency is shared with other data points provided.

The results in this range far exceed the highest calibration standard used, and the method (Method 18, Section 10.0, “Calibration and Standardization”<sup>2</sup>) requires users of the method to “*Prepare or obtain enough calibration standards so that there are three different concentrations of each organic compound expected to be measured in the source sample. For each organic compound, select those concentrations that bracket the concentrations expected in the source samples*” (emphasis added).

|                          |           |          |                |       |          |                       |
|--------------------------|-----------|----------|----------------|-------|----------|-----------------------|
| Steri-Tech NAO2021_1006. | 8/12/2021 | 12:42:56 | Ethylene Oxide | 0     | 0        | NAO Inlet ARV contrib |
| Steri-Tech NAO2021_1007. | 8/12/2021 | 12:44:39 | Ethylene Oxide | 0     | 0        |                       |
| Steri-Tech NAO2021_1008. | 8/12/2021 | 12:47:02 | Ethylene Oxide | 0     | 0        |                       |
| Steri-Tech NAO2021_1176. | 8/12/2021 | 18:31:42 | Ethylene Oxide | 0     | 0        | Start SCV Run 3       |
| Steri-Tech NAO2021_1177. | 8/12/2021 | 18:33:43 | Ethylene Oxide | 0     | 0        |                       |
| Steri-Tech NAO2021_1178. | 8/12/2021 | 18:35:48 | Ethylene Oxide | 0.74  | 1531.486 |                       |
| Steri-Tech NAO2021_1179. | 8/12/2021 | 18:37:51 | Ethylene Oxide | 0.726 | 1963.488 |                       |
| Steri-Tech NAO2021_1180. | 8/12/2021 | 18:39:54 | Ethylene Oxide | 0     | 0        |                       |
| Steri-Tech NAO2021_1181. | 8/12/2021 | 18:41:57 | Ethylene Oxide | 0     | 0        |                       |
| Steri-Tech NAO2021_1182. | 8/12/2021 | 18:44:00 | Ethylene Oxide | 0.726 | 4958.416 |                       |
| Steri-Tech NAO2021_1183. | 8/12/2021 | 18:46:03 | Ethylene Oxide | 0.736 | 1162.14  |                       |
| Steri-Tech NAO2021_1184. | 8/12/2021 | 18:48:06 | Ethylene Oxide | 0.743 | 450.3401 |                       |
| Steri-Tech NAO2021_1185. | 8/12/2021 | 18:50:09 | Ethylene Oxide | 0.73  | 332.229  |                       |
| Steri-Tech NAO2021_1186. | 8/12/2021 | 18:52:12 | Ethylene Oxide | 0.753 | 156.3311 |                       |

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<sup>1</sup> Using Method 18 calibration curve GC FID 0-502 ppm EtO equation  $y=0.1678x$  included in Addendum 1 of the Test Report dated October 26, 2021.

<sup>2</sup> [https://www.epa.gov/sites/default/files/2019-06/documents/method\\_18\\_0.pdf](https://www.epa.gov/sites/default/files/2019-06/documents/method_18_0.pdf)

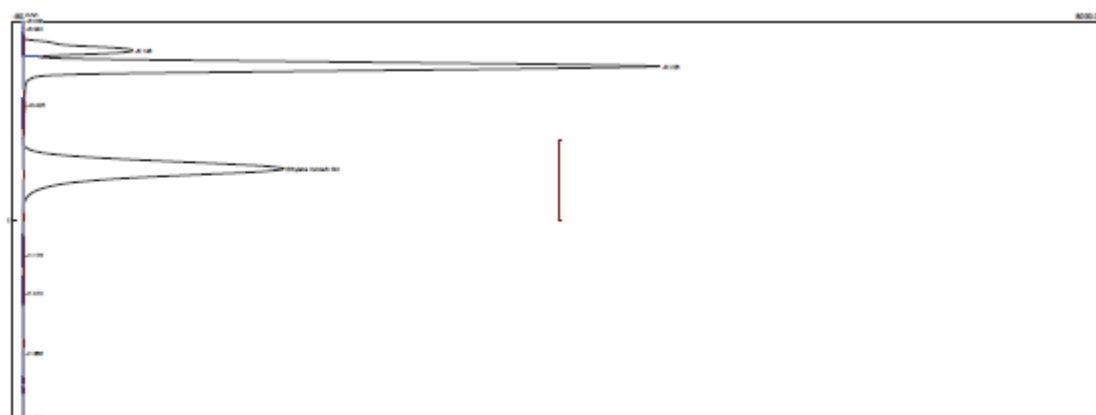
Lab name: LCH Consulting Associates, LLC  
 Client: Steri-Tech, Inc. Salinas, Puerto Rico  
 Client ID: STI  
 Analysis date: 08/12/2021 18:35:48  
 Method: Direct Injection  
 Description: FID-Outlet  
 Column: haysep n  
 Carrier: helium  
 Integration: Peak sens=95.0 Base sens=60.0 Min area= 0.00 Standard= 1.000 Sample= 1.000 Tangents=off  
 Data file: Steri-Tech NAO2021\_1178..CHR ()  
 Sample: Sample  
 Comments: NAO Outlet Stack

Temperature program:

| init temp | Hold  | Ramp  | Final temp |
|-----------|-------|-------|------------|
| 130.00    | 2.000 | 0.000 | 130.00     |

Events:

| Time  | Event              |
|-------|--------------------|
| 1.000 | ZERO               |
| 1.000 | SOUND              |
| 1.030 | F ON (ValveRotate) |
| 1.030 | G ON (ValveRotate) |



| Number | Component      | Retention | Area       |
|--------|----------------|-----------|------------|
| 1      | Ethylene Oxide | 0.740     | 10531.4393 |
| 1      |                |           | 10531.4393 |

## Example 2

GCFID raw data for file “Steri-Tech NAO2021\_1179,” generated on August 12, 2021, at 18:37:51, reported a result of 1,965.488. However, the chromatograph sheet for that same file includes an area count of 11,965.488, and equates to a concentration of ~2000 ppm. The result of 1,965.488 equates a concentration of ~330 ppm.

|                          |           |          |                |       |          |                       |
|--------------------------|-----------|----------|----------------|-------|----------|-----------------------|
| Steri-Tech NAO2021_1006. | 8/12/2021 | 12:42:56 | Ethylene Oxide | 0     | 0        | NAO inlet ARV contrib |
| Steri-Tech NAO2021_1007. | 8/12/2021 | 12:44:59 | Ethylene Oxide | 0     | 0        |                       |
| Steri-Tech NAO2021_1008. | 8/12/2021 | 12:47:02 | Ethylene Oxide | 0     | 0        |                       |
| Steri-Tech NAO2021_1176. | 8/12/2021 | 18:31:42 | Ethylene Oxide | 0     | 0        | Start SCV Run 3       |
| Steri-Tech NAO2021_1177. | 8/12/2021 | 18:33:45 | Ethylene Oxide | 0     | 0        |                       |
| Steri-Tech NAO2021_1178. | 8/12/2021 | 18:35:48 | Ethylene Oxide | 0.74  | 1531.486 |                       |
| Steri-Tech NAO2021_1179. | 8/12/2021 | 18:37:51 | Ethylene Oxide | 0.726 | 1965.488 |                       |
| Steri-Tech NAO2021_1180. | 8/12/2021 | 18:39:54 | Ethylene Oxide | 0     | 0        |                       |
| Steri-Tech NAO2021_1181. | 8/12/2021 | 18:41:57 | Ethylene Oxide | 0     | 0        |                       |
| Steri-Tech NAO2021_1182. | 8/12/2021 | 18:44:00 | Ethylene Oxide | 0.726 | 4958.416 |                       |
| Steri-Tech NAO2021_1183. | 8/12/2021 | 18:46:03 | Ethylene Oxide | 0.736 | 1162.14  |                       |
| Steri-Tech NAO2021_1184. | 8/12/2021 | 18:48:06 | Ethylene Oxide | 0.743 | 450.3401 |                       |
| Steri-Tech NAO2021_1185. | 8/12/2021 | 18:50:09 | Ethylene Oxide | 0.73  | 532.229  |                       |
| Steri-Tech NAO2021_1186. | 8/12/2021 | 18:52:12 | Ethylene Oxide | 0.753 | 156.3311 |                       |

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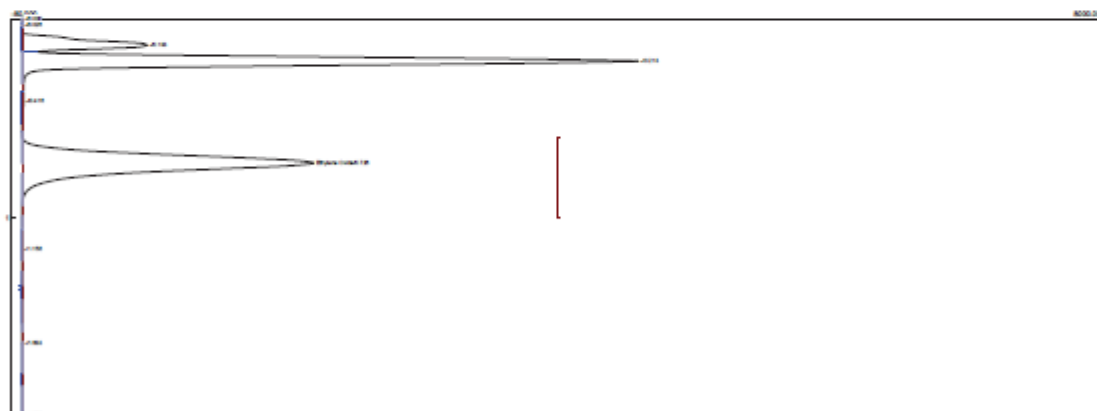
Lab name: LCH Consulting Associates, LLC  
Client: Steri-Tech, Inc. Salinas, Puerto Rico  
Client ID: STI  
Analysis date: 08/12/2021 18:37:51  
Method: Direct Injection  
Description: FID-Outlet  
Column: haysep n  
Carrier: helium  
Integration: Peak sens=95.0 Base sens=60.0 Min area= 0.00 Standard= 1.000 Sample= 1.000 Tangents=off  
Data file: Steri-Tech NAO2021\_1179.CHR (j)  
Sample: Sample  
Comments: NAO Outlet Stack

Temperature program:

|           |       |       |            |
|-----------|-------|-------|------------|
| Init temp | Hold  | Ramp  | Final temp |
| 130.00    | 2.000 | 0.000 | 130.00     |

Events:

|       |                    |
|-------|--------------------|
| Time  | Event              |
| 0.000 | ZERO               |
| 0.000 | SOUND              |
| 0.030 | F ON (ValveRotate) |
| 0.030 | G ON (ValveRotate) |



| Number | Component      | Retention | Area       |
|--------|----------------|-----------|------------|
| 1      | Ethylene Oxide | 0.726     | 11965.4880 |
| 1      |                |           | 11965.4880 |

### Example 3

GCFID raw data for file “Steri-Tech NAO2021\_1180,” generated on August 12, 2021, at 18:39:54, reported a result of 0. However, the chromatograph sheet for that same file includes an area count of 3,746.144 and equates to a concentration of ~628 ppm.

|                          |           |          |                |       |          |                       |
|--------------------------|-----------|----------|----------------|-------|----------|-----------------------|
| Steri-Tech NAO2021_1006. | 8/12/2021 | 12:42:56 | Ethylene Oxide | 0     | 0        | NAO inlet ARV contrib |
| Steri-Tech NAO2021_1007. | 8/12/2021 | 12:44:59 | Ethylene Oxide | 0     | 0        |                       |
| Steri-Tech NAO2021_1008. | 8/12/2021 | 12:47:02 | Ethylene Oxide | 0     | 0        |                       |
| Steri-Tech NAO2021_1176. | 8/12/2021 | 18:31:42 | Ethylene Oxide | 0     | 0        | Start SCV Run 3       |
| Steri-Tech NAO2021_1177. | 8/12/2021 | 18:33:45 | Ethylene Oxide | 0     | 0        |                       |
| Steri-Tech NAO2021_1178. | 8/12/2021 | 18:35:48 | Ethylene Oxide | 0.74  | 1531.486 |                       |
| Steri-Tech NAO2021_1179. | 8/12/2021 | 18:37:51 | Ethylene Oxide | 0.726 | 1965.488 |                       |
| Steri-Tech NAO2021_1180. | 8/12/2021 | 18:39:54 | Ethylene Oxide | 0     | 0        |                       |
| Steri-Tech NAO2021_1181. | 8/12/2021 | 18:41:57 | Ethylene Oxide | 0     | 0        |                       |
| Steri-Tech NAO2021_1182. | 8/12/2021 | 18:44:00 | Ethylene Oxide | 0.726 | 4958.416 |                       |
| Steri-Tech NAO2021_1183. | 8/12/2021 | 18:46:03 | Ethylene Oxide | 0.736 | 1162.14  |                       |
| Steri-Tech NAO2021_1184. | 8/12/2021 | 18:48:06 | Ethylene Oxide | 0.743 | 450.3401 |                       |
| Steri-Tech NAO2021_1185. | 8/12/2021 | 18:50:09 | Ethylene Oxide | 0.73  | 532.229  |                       |
| Steri-Tech NAO2021_1186. | 8/12/2021 | 18:52:12 | Ethylene Oxide | 0.753 | 156.3311 |                       |

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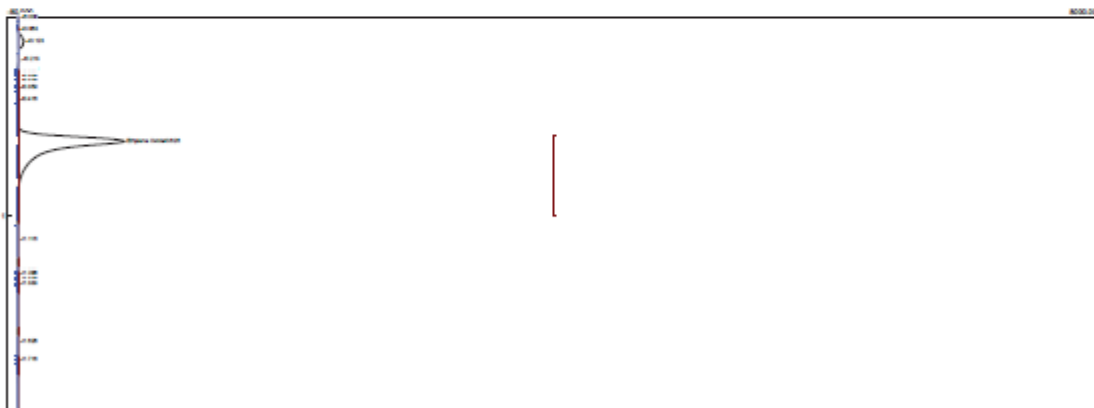
Lab name: LCH Consulting Associates, LLC  
 Client: Steri-Tech, Inc. Salinas, Puerto Rico  
 Client ID: STI  
 Analysis date: 08/12/2021 18:39:54  
 Method: Direct Injection  
 Description: FID-Outlet  
 Column: haysep n  
 Carrier: helium  
 Integration: Peak sens=95.0 Base sens=60.0 Min area= 0.00 Standard= 1.000 Sample= 1.000 Tangents=off  
 Data file: Steri-Tech NAO2021\_1180..CHR ()  
 Sample: Sample  
 Comments: NAO Outlet Stack

Temperature program:

|           |       |       |            |
|-----------|-------|-------|------------|
| Init temp | Hold  | Ramp  | Final temp |
| 130.00    | 2.000 | 0.000 | 130.00     |

Events:

|       |                    |
|-------|--------------------|
| Time  | Event              |
| 0.000 | ZERO               |
| 0.000 | SOUND              |
| 0.030 | F ON (ValveRotate) |
| 0.030 | G ON (ValveRotate) |



| Number | Component      | Retention | Area      |
|--------|----------------|-----------|-----------|
| 1      | Ethylene Oxide | 0.626     | 3476.1440 |
| 1      |                |           | 3476.1440 |

## Example 4

GCFID raw data for file “Steri-Tech NAO2021\_1181,” generated on August 12, 2021, at 18:41:57, reported a result of 0. However, the chromatograph sheet for that same file includes an area count of 5,125.3243 and equates to a concentration of ~860 ppm.

|                          |           |          |                |       |          |                       |
|--------------------------|-----------|----------|----------------|-------|----------|-----------------------|
| Steri-Tech NAO2021_1006. | 8/12/2021 | 12:42:56 | Ethylene Oxide | 0     | 0        | NAO inlet ARV contrib |
| Steri-Tech NAO2021_1007. | 8/12/2021 | 12:44:59 | Ethylene Oxide | 0     | 0        |                       |
| Steri-Tech NAO2021_1008. | 8/12/2021 | 12:47:02 | Ethylene Oxide | 0     | 0        |                       |
| Steri-Tech NAO2021_1176. | 8/12/2021 | 18:31:42 | Ethylene Oxide | 0     | 0        | Start SCV Run 3       |
| Steri-Tech NAO2021_1177. | 8/12/2021 | 18:33:45 | Ethylene Oxide | 0     | 0        |                       |
| Steri-Tech NAO2021_1178. | 8/12/2021 | 18:35:48 | Ethylene Oxide | 0.74  | 1531.486 |                       |
| Steri-Tech NAO2021_1179. | 8/12/2021 | 18:37:51 | Ethylene Oxide | 0.726 | 1965.488 |                       |
| Steri-Tech NAO2021_1180. | 8/12/2021 | 18:39:54 | Ethylene Oxide | 0     | 0        |                       |
| Steri-Tech NAO2021_1181. | 8/12/2021 | 18:41:57 | Ethylene Oxide | 0     | 0        |                       |
| Steri-Tech NAO2021_1182. | 8/12/2021 | 18:44:00 | Ethylene Oxide | 0.726 | 4958.416 |                       |
| Steri-Tech NAO2021_1183. | 8/12/2021 | 18:46:03 | Ethylene Oxide | 0.736 | 1162.14  |                       |
| Steri-Tech NAO2021_1184. | 8/12/2021 | 18:48:06 | Ethylene Oxide | 0.743 | 450.3401 |                       |
| Steri-Tech NAO2021_1185. | 8/12/2021 | 18:50:09 | Ethylene Oxide | 0.73  | 532.229  |                       |
| Steri-Tech NAO2021_1186. | 8/12/2021 | 18:52:12 | Ethylene Oxide | 0.753 | 156.3311 |                       |

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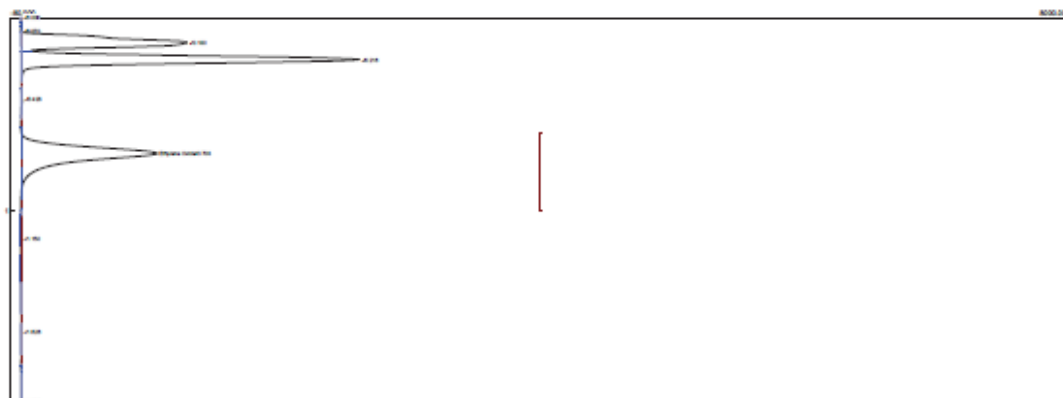
Lab name: LCH Consulting Associates, LLC  
 Client: Steri-Tech, Inc. Salinas, Puerto Rico  
 Client ID: STI  
 Analysis date: 08/12/2021 18:41:57  
 Method: Direct Injection  
 Description: FID-Outlet  
 Column: haysep n  
 Carrier: helium  
 Integration: Peak sens=95.0 Base sens=60.0 Min area= 0.00 Standard= 1.000 Sample= 1.000 Tangents=off  
 Data file: Steri-Tech NAO2021\_1181..CHR ( )  
 Sample: Sample  
 Comments: NAO Outlet Stack

Temperature program:

| Init temp | Hold  | Ramp  | Final temp |
|-----------|-------|-------|------------|
| 130.00    | 2.000 | 0.000 | 130.00     |

Events:

| Time  | Event              |
|-------|--------------------|
| 0.000 | ZERO               |
| 0.000 | SOUND              |
| 0.030 | F ON (ValveRotate) |
| 0.030 | G ON (ValveRotate) |



| Number | Component      | Retention | Area      |
|--------|----------------|-----------|-----------|
| 1      | Ethylene Oxide | 0.703     | 5125.3243 |
| 1      |                |           | 5125.3243 |

A similar issue to the one indicated in Examples 3 and 4 was also identified for the analysis conducted on August 12, 2021, at 18:31:42 and 18:33:45, for which the GCFID raw data reported values of 0, but the chromatograph indicates area counts of 107.8727 and 5,236.8869, respectively, which equates to concentrations of ~18 ppm and ~880 ppm, respectively.